

EXHIBIT J

From: Leland Belew <LBelew@milberg.com>
Sent: Friday, October 28, 2022 5:33 PM
To: Hector Torres; Cindy Caranella Kelly; Stephen P. Thomasch; Jodi Munn Schebel; boyle@dbmslaw.com; kienzle@dbmslaw.com; Mary Novacheck - NLWF
Cc: John Fabry; Mark Miller; Mitchell Breit; Ryan McMillan; Sidney Robert; Tyler Litke; Alex Rudenco; Andrew Smith; Christian Torres; Ginny Whitener; Kelsey Davies; Luis Cardona; Morgan Ferrell
Subject: Meet and Confer Phone Call Follow-Up
Attachments: PLTFS' RFPs to Ford Set 4 2022.09.28.pdf; Pltfs NOD 30b6 2d 2022.10.28.pdf; Pltfs NOD Norris 2022.10.28.pdf

Jodi,

Thank you again for the call earlier today. I write to follow-up on a few of the items that we discussed. First, we are able to oblige your request to again move the dates for Mr. Gawronski's deposition, and are finalizing the location. Thank you for confirming that you can accept service of the updated subpoena; we will serve that shortly.

With respect to our discussion of Interrogatory no. 22 (and corresponding Request for Production 61), we have compiled the list of dealerships you insisted we provide for Ford to know which geographical areas, and associated Field Service Engineers ("FSEs"), are being sought:

1. Buss Ford in McHenry, IL
2. Citrus Ford in Ontario, CA
3. The Ford Store Morgan Hill in Morgan Hill, CA
4. Townsend Ford in Townsend, MA
5. Colonial Ford in Marlborough, MA
6. Quirk Ford in Quincy, MA
7. York Ford in Saugus, MA
8. Ditschman Ford in Flemington, NJ
9. Healey Brother's Dealership in Goshen, NY
10. Leo Kaytes in Warwick, NY
11. Pegues-Hurst in Longview, TX

You were equivocal about whether this would actually resolve Ford's objections, but we hope with this information you're able to provide the information sought without delay. For purposes of responding to Plaintiffs' corresponding RFP 61, we understand Ford's position to be that it has already produced responsive documents through its production of GCQIS data. As I indicated, we believe that is insufficient; not only is it not specific to the individuals responsive to Interrogatory no. 22, but there is no assurance or indication that such information is complete. In order to respond to RFP 61, Ford should run the following single search string against the Ford email accounts for the individuals responsive to Interrogatory no. 22:

(10R or 10-speed or "10 speed") and (hesitat*, rough*, lurch*, jerk*, stall*, slip*, engag*)

Obviously, this string might need to be modified to accommodate whatever search parameters and 'wildcards' are utilized by the relevant email client. And Plaintiffs are otherwise willing to meet and confer on this search term, particularly if a hit report demonstrates how it might be improved.

I also raised Plaintiffs' request that Brian O'Neil and Adam Stratton be made custodians for purposes of Ford's document production, and our belief that these are particularly appropriate individuals for whom to employ search terms. For purposes of simplicity, we propose that the same single search term proposed above for the FSEs be applied to the custodial files for Messrs. O'Neil and Stratton. You agreed to bring this request to your client, but could not give any sense of when you would be able to respond. Obviously, we would appreciate a response as soon as possible so that we can continue discussion of this topic.

Finally, attached please find Plaintiffs' further discovery requests; specifically, a request for product of documents, a notice of deposition for Kevin Norris, and additional topics for a 30(b)(6) deposition. With respect to the Norris deposition, we request that you determine his availability in the first couple of weeks in December. For the 30(b)(6) topics, we would again like to meet and confer as soon as you can make yourselves available; please let us know if you are going to insist on waiting another two weeks before serving Ford's objections and making yourself available for a meet and confer, or if we can expedite that process.

Thank you, and have a nice weekend,
Leland Belew

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